

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

IN RE:

TRI-CITY COMMUNITY  
ACTION PROGRAM, INC.,

Debtor.

Chapter 11 Case  
No. 15-11569-JNF

TRI-CITY COMMUNITY  
ACTION PROGRAM, INC.,

Plaintiff,

v.

PHILIP BRONDER-GIROUX, and  
ANN HOWSER,

Defendants.

Adversary Proceeding  
No. 17-01035-JNF

**JOINT MOTION TO APPROVE  
PROPOSED DISCOVERY PLAN AND RULE 26(f) CERTIFICATION**

Plaintiff Tri-City Community Action Program, Inc., by and through the Official Committee of Unsecured Creditors (the “Committee”), and defendants Philip Bronder-Giroux, individually and in his capacity as an officer and director of the Debtor (“Bronder-Giroux”) and Ann Howser, individually and in her capacity as an officer of the Debtor (“Howser”) (together, the “Parties”) hereby ask that this Court approve this Proposed Discovery Plan and Rule 26(f) Certification, set forth herein. This discovery plan constitutes a change from that set forth in the Court’s Pretrial Order dated May 30, 2017. The changes are necessary to accommodate the amount of discovery and preparation necessary to prepare for trial and to account for the vacation schedules of counsel.

07/21/2017 Motion allowed.

*John H. Fahey*